

## **REMARKS**

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed July 1, 2008. Claims 1, 4-6, 8, 9, 15, 17, 18, 21, 25-27, 29, 30, 36 and 44-54 stand rejected. In this amendment, claims 1, 21, and 44 have been amended. No claims have been canceled. No claims have been added. No new matter has been added. Accordingly, claims 1, 4-6, 8, 9, 15, 17, 18, 21, 25-27, 29, 30, 36 and 44-54 are presented for examination.

### **Summary of Rejections under 35 U.S.C. §103**

The Examiner rejected claims 1, 4-5, 15, 21, 25-26, 36, 44, 46-50, and 53-54 under 35 U.S.C. §103(a) as being unpatentable over Chacon, (U.S. Patent No. 6,128,588, hereinafter “Chacon”), in view of Floyd, et al. (U.S. Patent Application No. 2002/0105355, hereinafter “Floyd”).

Claims 6, 8-9, 27 and 29-30 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chacon in view of Floyd as applied to claims 1, 4-5, 15, 21, 25-26, 36, 44, 46-50 and 53-54 above, and further in view of Beauchesne, (U.S. Patent No. 5,777,876, hereinafter “Beauchesne”).

Claims 17-18, 45 and 51-52 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chacon in view of Floyd as applied to claims 1, 4-5, 15, 21, 25-26, 36, 44, 46-50, and 53-54 above, in view of Martorana, et al., (U.S. Patent Application No. 2003/0236628, hereinafter “Martorana”).

Claims 1, 4-6, 8, 9, 15, 44, 47, 49-51, 53 and 54

The Examiner rejected claims 1, 4-5, 15, 21, 25-26, 36, 44, 46-50, and 53-54 under 35 U.S.C. §103(a) as being unpatentable over Chacon in view of Floyd.

Claim 1 has been amended to recite:

A method of storing information in a database to characterize attributes outputted by different classes of equipment, comprising:  
storing in a first database table of a database memory device a plurality of attribute data records, wherein storing each attribute data record includes:  
storing in that record a first field identifying a class of equipment, **at least one class of equipment having a plurality of signal lines for outputting attribute data;**  
storing in that record a second field identifying an attribute whose value is outputted by the class of equipment identified by the first field of that record, wherein said attribute is a sensor measurement or operating parameter of said class of equipment identified by said first field; and  
storing in that record a third field specifying an ID which the class of equipment identified by the first field of that record assigns to the attribute identified by the second field of that record, **wherein the ID identifies a first one of the plurality of signal lines;** and  
storing in a second database table that is a child table of the first database table a plurality of subordinate data records, wherein storing each subordinate data record includes:  
storing in the subordinate data record one or more subordinate fields that are subordinate to the second field of an attribute data record;  
wherein the first field, second field, third field and one or more subordinate fields, in combination, define communications interface specifications that enable a diagnostic apparatus to retrieve distinct attribute information from distinct classes of equipment.

(emphasis added).

Claim 44 has been similarly amended.

Chacon teaches a scheduler database that stores production models and data for simulation. The scheduler database obtains all data for simulation **from a manufacturing execution system** entitled PROMIS. (Chacon, col. 3, lines 58-65; col. 14, lines 18-36; col. 16 lines 63-66). The scheduler database does not obtain data from manufacturing equipment, much less manufacturing equipment that has a plurality of

signal lines. Nor does the scheduler database include a field that defines an ID identifying a specific one of a plurality of signal lines. In contrast, as amended claims 1 and 44 recite, “a first field identifying a class of equipment, at least one class of equipment having a plurality of signal lines for outputting attribute data,” and “a third field specifying an ID which the class of equipment identified by the first field of that record assigns to the attribute identified by the second field of that record, wherein the ID identifies a first one of the plurality of signal lines.”

Floyd teaches a controller having a database 400 that includes multiple tables. The database 400 enables the controller to send commands to and receive data from various test equipment via a **single signal line** that connects the controller to the test equipment. (Floyd, paragraphs [0090], [0143-45] and [0149]). However, Floyd fails to teach connecting the controller to manufacturing equipment, much less connecting the controller to manufacturing equipment having multiple signal lines. Moreover, Floyd also fails to teach or suggest a database table that identifies a particular one of multiple signal lines from which to receive data. Therefore, Floyd fails to teach or suggest the limitations of claims 1 or 44 that are missing from Chacon.

The current Office Action states that Chacon fails to teach, “providing a first manufacturing equipment having a plurality of signal lines for outputting attribute data,” and “receiving a value of the first attribute from the first signal line.” However, the current Office Action cites Floyd as teaching such limitations. Specifically, the current Office Action cites paragraphs [00145], [0148], [0090] and the abstract as teaching these limitations.

Although the Office Action has provided column and line number citations to Floyd, there is no analysis of how the Examiner is reading the disclosure of Floyd to include the missing

features of Chacon. Moreover, such is not self-evident by the disclosure of Floyd, in particular because Floyd does not describe manufacturing equipment having multiple signal lines, much less a field of a database table that identifies particular signal lines. Therefore, Applicant respectfully requests that the Examiner provide an analysis of how she is reading the claim limitations onto the disclosure of Floyd.

Neither Chacon nor Floyd, alone or in combination, teach or suggest all of the limitations of claim 1 or 44. Accordingly, Applicant respectfully asserts that claims 1 and 44, and their corresponding dependent claims, are in condition for allowance, and request that the rejection under 35 U.S.C. § 103(a) be withdrawn.

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

#### Claims 17, 18, 45 and 52

Claims 17-18, 45 and 51-52 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chacon, in view of Floyd, and further in view of Martorana.

The current Office Action states that neither Chacon nor Floyd teach storing a third field specifying a conversion parameter that defines a conversion of the value of the attribute identified in the second field into physical units of measurement. However, the current Office Action cites Martorana as teaching such a feature. In explanation of Examiner's reasoning, the Office Action states, "as a system includes a thermal isolating chamber, an inertial measurement unit for making inertial measurements, and a temperature control system (Martorana, par. [0014]).

Applicant respectfully disagrees with Examiner's characterization of Martorana. Martorana teaches a navigation system for a drilling rig. The navigation system of Martorana monitors a direction of a drill bit. (Martorana, par. [0003]). The navigation system is protected from high temperatures and pressures by a thermal and pressure isolating chamber, and from vibrations by a vibration and shock isolation system. (Martorana, pars. [0012-14]). Martorana **fails to teach a database, database tables, fields of database tables, classes of equipment, or a diagnostic apparatus.** Moreover, Martorana fails to teach storing a third field specifying a conversion parameter that defines a conversion of the value of the attribute identified in the second field into physical units of measurement. Accordingly, Martorana fails to teach or suggest the features of claims 17 and 45 that are missing from the combination of Chacon and Floyd.

Although the Office Action has provided column and line number citations to Martorana, there is no analysis of how the Examiner is reading the disclosure of Martorana to include the missing features of Chacon and Floyd. Moreover, such is not self-evident by the disclosure of Martorana, in particular because Martorana does not describe a database, database tables, fields of database tables, classes of equipment, or a diagnostic apparatus. Therefore, Applicant respectfully requests that the Examiner provide an analysis of how she is reading the claim limitations onto the disclosure of Martorana.

None of Chacon, Floyd or Martorana, alone or in combination, teach or suggest all of the limitations of claims 17 or 45. Accordingly, Applicant respectfully requests that Examiner withdraw his rejection under 35 U.S.C. § 103(a) to claims 17 and 45, and their corresponding dependent claims.

Moreover, Applicant respectfully submits that the combination of Martorana with Floyd and Chacon is improper. The teachings of Martorana are incompatible with those of Floyd and

Chacon. Chacon and Floyd teach systems that are used to perform specific functions in the manufacturing and testing, respectively, of integrated circuits (See Floyd, pars. [0005], [0012], [0013]; see Chacon, col. 1, lines 20-44). Both the system of Chacon and the system of Floyd use a database to facilitate their functions. (See Floyd, Abstract; See Chacon, col. 2, lines 60-67). In contrast, Martorana teaches a navigation system for a drilling rig. Martorana does not relate to manufacturing or device testing, much less manufacturing or device testing of integrated circuits. Nor does Martorana teach any form of database. Accordingly, Applicant respectfully submits that the combination of Martorana with Chacon and Floyd is improper.

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

#### Claims 21, 25-27, 29-30 and 36

The Examiner rejected claims 1, 4-5, 15, 21, 25-26, 36, 44, 46-50, and 53-54 under 35 U.S.C. §103(a) as being unpatentable over Chacon in view of Floyd.

Claim 21 has been amended to recite:

A diagnostic apparatus for monitoring electronic equipment, comprising:  
a computer-readable data storage device in which a plurality of attribute data records are stored in a first database table and a plurality of subordinate data records are stored in a second database table that is a child table of the first database table, wherein each attribute data record includes:

a first data field that stores data identifying a class of equipment,  
a second data field that stores data identifying an attribute whose value is outputted by the class of equipment identified by the first field of that record, and

a third data field that stores data specifying an ID which the class of equipment identified by the first field of that record assigns to the attribute value identified by the second field of that record;

wherein each subordinate data record includes one or more subordinate

fields that are subordinate to the second field of an attribute data record, **at least one subordinate field specifying a conversion parameter that defines a conversion of the value of the attribute identified in the second field into physical units of measurement**, wherein the first field, second field, third field and one or more subordinate fields, in combination, define communications interface specifications that enable a diagnostic apparatus to retrieve distinct attribute information from distinct classes of equipment; and  
a computer connected to read data from the data storage device.

(emphasis added).

As described above, none of Chacon, Floyd or Martorana, alone or in combination, teach or suggest storing a third field specifying a conversion parameter that defines a conversion of the value of the attribute identified in the second field into physical units of measurement. For similar reasons, the combination of Chacon, Floyd and Martorana also fails to teach or suggest at least one subordinate field specifying a conversion parameter that defines a conversion of the value of the attribute identified in the second field into physical units of measurement.

Therefore, None of Chacon, Floyd or Martorana, alone or in combination, teach or suggest all of the limitations of claim 21 or its dependent claims. Accordingly, Applicant respectfully requests that Examiner withdraw his rejection under 35 U.S.C. § 103(a) to claim 21 and its corresponding dependent claims.

## **Conclusion**

Accordingly, Applicant respectfully requests the withdrawal of the rejections and submits that pending claims 1, 4-6, 8, 9, 15, 17, 18, 21, 25-27, 29, 30, 36 and 44-54 are in condition for allowance. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Benjamin Kimes at (408) 720-8300.

## **DEPOSIT ACCOUNT AUTHORIZATION**

Authorization is hereby given to charge our Deposit Account No. 022666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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